

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

MATTHEW JOHNSON,	§	
<i>Petitioner,</i>	§	
	§	
v.	§	
	§	CIV. ACT. NO. 3:19-CV-02310-E
LORIE DAVIS, Director,	§	(Death Penalty Case)
Texas Department of Criminal	§	
Justice, Correctional Institutions	§	
Division,	§	
<i>Respondent.</i>	§	

**RESPONDENT'S UNOPPOSED MOTION
TO SUBSTITUTE COUNSEL**

The respondent, Lorie Davis (the Director) was last represented in this proceeding by Assistant Attorney General Tomee Heining. It has become administratively necessary, however, to re-assign this case to the undersigned Assistant Attorney General, Adham Bissar. Accordingly, the undersigned moves this Court to permit Tomee Heining to withdraw as counsel for the Director and allow substitution of Adham Bissar in her place. The motion is not designed to harass the petitioner or to delay this proceeding, and all correspondence should be sent to the same address.

For the foregoing reasons, the undersigned respectfully requests that this Court grant this motion and allow Tomee Heining to withdraw as counsel for the Director and substitute Adham Bissar as lead counsel in her place.

CONCLUSION

The Director respectfully requests that the Court allow Tomee Heining to withdraw as counsel and substitute the undersigned as counsel of record for the Director.

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

JEFFREY C. MATEER
First Assistant Attorney General

MARK PENLEY
Deputy Attorney General
For Criminal Justice

EDWARD L. MARSHALL
Chief, Criminal Appeals Division

*Lead Counsel

s/ Adham R. Bissar
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ATTORNEYS FOR RESPONDENT

CERTIFICATE OF CONFERENCE

I certify that I conferred with Johnson's counsel, Jeffrey Robert Newberry, about this motion and he stated that he was unopposed to this motion.

s/ Adham R. Bissar
ADHAM R. BISSAR
Assistant Attorney General

CERTIFICATE OF SERVICE

I do hereby certify that on January 28, 2020, I electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court, Northern District of Texas, using the electronic case-filing system of the Court. The electronic case-filing system sent a "Notice of Electronic Filing" (NEF) to the following counsel of record, who consented in writing to accept the NEF as service of this document by electronic means:

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s/ Adham R. Bissar
ADHAM R. BISSAR
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